

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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EUNICE RAQUEL FLORES THOMAS, on behalf of  
herself, individually, and on behalf of all others similarly  
situated

Plaintiffs,

-against-

STIPULATION

Case No.: 1:22-cv-3110-GW-SLC

AAM HOLDING CORP. d/b/a FLASHDANCERS  
GENTLEMEN'S CLUB, and 59 MURRAY STREET  
ENTERPRISES, INC. d/b/a FLASHDANCERS  
GENTLEMEN'S CLUB, and BARRY LIPSITZ,  
individually, and BARRY LIPSITZ, JR., individually

Defendants.

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This Stipulation is entered into by Plaintiff Eunice Raquel Flores Thomas ("Plaintiff"), on the one hand, and Defendants AAM Holding Corp. d/b/a Flashdancers Gentlemen's Club, 59 Murray Street Enterprises, Inc. d/b/a Flashdancers Gentlemen's Club, Barry Lipsitz, and Barry Lipsitz, Jr., ("Defendants"), on the other hand, by and through their undersigned counsel.

**WHEREAS**, on or about April 14, 2022, Plaintiff filed the Complaint (the "Complaint") in this matter, on behalf of herself, individually, and on behalf of all others similarly situated, alleging various violations of the Fair Labor Standards Act and the New York Labor Law;

**WHEREAS**, on May 5, 2022, Defendants waived service of the Summons and Complaint;


**WHEREAS**, on or about April 27, 2022, Defendants notified Plaintiff's counsel that Plaintiff had previously agreed to individually arbitrate the claims alleged in the Complaint with the American Arbitration Association ("AAA") pursuant to agreements entered into with, or otherwise covering, each of the Defendants; and

**WHEREAS**, Plaintiff and Defendants agree that AAA's Employment Arbitration Rules and Mediation Procedures will apply to govern the AAA's arbitration of this matter.

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and among the parties to this stipulation, that the above captioned matter will be stayed pending arbitration before the AAA.

Dated: May 9, 2022

**BORELLI & ASSOCIATES, PLLC**



Danielle Petretta, Esq.  
910 Franklin Avenue, Suite 200  
Garden City, New York 11530  
Tel.: (516) 248-5550  
Fax.: (516) 248-6027  
Email: DP@employmentlawyernewyork.com  
*Attorneys for Plaintiff*

**AKERMAN LLP**



Jeffrey A. Kimmel, Esq.  
1251 Avenue of the Americas, 37<sup>th</sup> Floor  
New York, New York 10020  
Tel.: (212) 259-6435  
Fax.: (212) 905-6408  
Email: jeffrey.kimmel@akerman.com  
*Attorneys for Defendants*

**SO ORDERED:**

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Hon. Sarah L. Cave